

August 27, 2011

To: Dr. Jeff Michael, ESP Team Leader
Don Nottoli, DPC Chair
Michael Machado, DPC Executive Director

From: Mary McTaggart
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Resident of Lisbon District (RD 307)

Re: Comments on Draft Economic Sustainability Plan

"Not everything that can be counted counts, and not everything that counts can be counted." - Albert Einstein

"The first role of intelligent tinkering is to save all the pieces." - Aldo Leopold

I commend the Team and all who have worked so far on the ESP for a spirited, efficient, and diligent effort. Having read and studied much of the Administrative Draft, all of the Public Draft, the Executive Summary, and attended all of the June 23 DPC meeting and the Clarksburg Public Review meeting on August 23, I offer the following comments, possible corrections, and impressions for your consideration. Unfortunately, my time and typing skills are limited, so these comments are organized basically from front to back in no prioritized manner. Thank you for your consideration in reading them.

1) Table of Contents: Why aren't the Appendices listed with their titles here? They are referred to in the text but with little identifying information other than a letter. Also please separate Maps from Figures, as is often done in other reports I have seen.

2) Pg. 9: Suggest you use "Plan" or "ESP" to refer to it hereafter.

3) Pg. 9: You have separated BDCP impacts into 4 categories for evaluation, yet somewhere you need to emphasize that it is a package deal and all of its policies, whatever they turn out to be, will be implemented together, having synergistic and cumulative impacts throughout the Delta economy. (death by a thousand cuts effect). In addition, according to Melinda Terry of North Delta Water Agency, even if the BDCP is not permitted, habitat restoration will proceed in the Delta.

4) Pg. 9: When quoting from law, please give reference numbers.

5) Pg. 10: "...the Delta as an evolving place" is an enigmatic phrase in the law - it would be helpful if you could define or describe more clearly what you believe is meant by such a usage, or clarify what the lawmakers intended.

6) Pg. 10: Limitations...: 1) You mention you will not assess short-run impacts of capital spending, which apparently is seen as a positive. However the short-run impacts of the acquisition of land and the building of ever-increasing numbers of BDCP facilities may result in a fairly hard blow that just keeps coming, pushing the local economy to a tipping point fairly soon before any of the measures you recommend have a chance to get off the ground, especially in view of the general lack of funding from all sources.

7) Pg. 11: "Geographic Focus..." Place the map in Figure 7 or a good clear one like it here, plus a map to show where the Delta is in relation to both the urban areas around it (and the extent of the urban part of the Secondary Zone) and within the state as a whole - the sooner readers know where they are, the better.

8) Pg. 11: "...the report focuses on the Primary Zone and City of Isleton". There is confusion throughout the report about Isleton. (See p. 30 top, pp. 230 and 236, which all say Isleton is the only incorporated city in the Primary Zone; it is in the Secondary Zone, though surrounded by Primary Zone, and p. 179 middle which correctly says there are no incorporated cities in the Primary Zone.) More needs to be said about the roles of the Primary Zone (PZ) and Secondary Zone (SZ) at the outset and all in one place, including how they came to be, purposes of each, relative locations, and the fact that together they comprise the Legal Delta. Refrain from formulations such as in the second paragraph "The Legal Delta, both primary and secondary..."; capitalize the Zones at all times. In any case, a discussion of how and why Isleton came to be in the SZ at all might be illustrative.

9) Pg. 13: Several references in the last two paragraphs seem to show a lack of understanding and appreciation for rural cultures and landscapes. The Primary Zone is rural and resource-based because the State, the Counties, and its people, for the most part, want it that way. As such, of course "it does not appear to be participating in...regional or statewide growth... (;) it lacks the public infrastructure and services to support robust growth", but robust growth would soon just turn it into an urban area, as has happened to areas both within and just outside the SZ.

10) Pg. 14 top: "...age distribution in the Primary Zone has shifted older": some of this is due to the fact that Delta housing is quite expensive, due to its desirable rural location, putting it out of reach of younger families, including those whose older generations already live in the Delta. Another factor is the difficulty younger beginning farmers have acquiring land to make a start.

11) Pg. 14 middle: Please identify the Sacramento River Corridor more definitely if you are going to capitalize it. It appears elsewhere but nowhere is the exact location or extent of it made clear.

12) Pg. 14 bottom: "...and this proportion appears to be shrinking" is redundant and leaves a negative impression; of course the proportion of PZ population to the Legal Delta's total is shrinking if it is remaining unchanged and that of the SZ is rising.

13) Pg. 15 top: Please be more specific about how "economic feasibility" is preventing

growth from spreading from SZ to PZ.

14) Pg. 27 bottom: "Governance": "The Delta Area Planning Council...adopted a plan for the region...Funding...dwindled in the late 1980's and interest in State-level planning and coordination increased..." Please tell a little more about what the counties planned, what, if anything, was accomplished, and how and why funding, and presumably interest, dwindled, leading to a State take-over of planning for the Delta.

15) Pg. 28: Use of the phrase "core of the Legal Delta" for the PZ, which you have already stated makes up 67% by area of the Legal Delta (Pg. 15 footnote #2) leaves the impression it is somehow the much smaller portion. This sentence is already awkward, as the PZ is not "largely water-covered" - not yet, anyway. Suggest "and the Primary Zone, lower in elevation and composed of largely agricultural and water-covered lands forming the bulk of the central area of the Legal Delta."

16) Pg. 30: 4.1: "urban limit line due to soil subsistence" Change "subsistence" to "subsidence"?

17) Pg. 30: 4.1.1: bottom: "nearby tracts as a special Delta Recreation and Resources..." something missing here?

18) Pg. 31 4.1.4: "...Knightsen has been discussed as a potential Legacy Community (see Chapter 12 for more information)" There is no information in Chapter 12 about this issue, or indeed about Knightsen at all.

19) Pg. 35: 4.5: In your description of the eastern portion of Yolo County, there is a little confusion. Better would be..."the unincorporated community of Clarksburg along with the agricultural lands and rural inhabitants of Netherlands District (RD 999), Merritt Island (RD150), and Lisbon District (RD 307)."

20) Pg. 35: 4.5.2: Replace the first two sentences with "A special plan has been prepared for the community of Clarksburg, which is the only unincorporated community in the Yolo County portion of the Primary Zone."

21) Pg. 36, 5 (1st paragraph): Replace "...the center of the Legal Delta" by "that forms the heart (or bulk, or central two-thirds) of the Legal Delta." Again, the word "center" implies a smaller place than is warranted, relative to the size of the surrounding SZ.

Also, you have not made clear, and existing maps also leave a bit fuzzy, that the Legal Delta is made up only of the Primary and Secondary Zones together.

22) Pg. 43 bottom: Did you mean to say that the historic Delta contained no large permanent expanses of open water?

23) Pg. 48 top...but only a fraction of the Legal Delta is more than 15 feet below sea level." Can we tell them in print exactly what fraction? The widely circulated mythical notion that much of the Delta is 25 or more feet below sea level needs to be soundly and explicitly countered; maybe this is a good place to do that.

- 24) Pg. 50 (3rd paragraph): "...Appropriate investments, but that is beyond..."
- 25) Pg. 64: 3.3.4 The second sentence of the last paragraph is very much too long.
- 26) Pg. 66 middle: "...it is more than five times less expensive than..." might sound better as "... it is less than one-fifth as expensive..." if in fact my math is correct.
- 27) Pg. 75 Chapter 5 (end of 2nd paragraph): I could find no discussion in the recreation chapter of the recent recreation plan developed by California State Parks - quite an omission, it seems to me.
- 28) Pg. 76: "Baseline Habitat Conservation Measures: None". As I stated before, Melinda Terry of the North Delta Water Agency told landowners in a public meeting that they could expect Delta habitat restoration projects to go forward even if the BDCP were not permitted. She did not elaborate, but I'm sure she would explain if she were asked.
- 29) Pg.76: 2: Add to "five new water intakes" the phrase "each with a 90-acre footprint" (source: December 2010 Highlights of the BDCP). Further, the intakes are actually between Freeport and Courtland on the east side of the Sacramento River: Intake #1 is north of Clarksburg and is part of every conveyance alternative except #4 (BDCP August 2011 Update) What is not often mentioned is that the shoreline on the opposite side of the River from each intake will also be set back and otherwise altered, likely impacting farms, levee roadways, and a number of residences.
- 30) Pg. 79 (and elsewhere) top sentence: "...agricultural easements or purchases on 32,000 acres...". The BDCP August 2011 Update says "...on up to 16,620 to 32,640 acres..." an odd formulation; Perhaps the higher figure is more likely in the end.
- 31) Pg. 79 top Channel Margin Habitat: "20 linear miles of north Delta waterways...along the river". A) According to the BDCP Highlights (December 2010), this habitat will be located in four different areas of the Delta, including in the south Delta along the San Joaquin and/or Old Rivers; B) Replace "...along the river" with "along the water's edge"; alternatively identify any "river" mentioned.
- 32) Pg. 79 top "...fishery enhancements that is less costly on the local agriculture economy". Replace "on" with "to", and "agriculture" with "agricultural".
- 33) Pg. 79 (4) - Levee Scenarios: Who has proposed these scenarios? What is the title of the PPIC report cited? Which appendix discusses the Suddeth, Mount and Lund analysis? Why is a smaller open-water scenario likely to be considered by the DSC?
- 34) Pg. 80 (5) bottom: The sentence beginning "As the Stewardship Council's third draft plan is written..." is awkward and might be dropped, since the fourth draft is cited on P. 81. It should be emphasized that the passage there in bold places a large number of Delta land use activities in limbo; after all, couldn't most of the Delta be considered floodplain? Also, please identify more specifically the DWR "studies" referred to in the last sentence of the bold passage.

35) Pg. 81: "Reduced land-use regulation.." The Delta Counties have proposed the "one mechanism" of shifting Legacy Communities from PZ to SZ (it is not known to what extent local sentiment in those communities supports this move). Deltans have learned not to consider any potential act of the Legislature "unlikely", so please be more specific about why the Legislature would be hesitant to enact such a change.

36) Pg. 82 - 6: The sentence beginning, "For some of the strategies..." is awkward and too complicated. Please provide the exact titles, completion dates or current status, and sources/sponsoring groups for each study mentioned. Aside: the frequent use of the word "innovative" to refer to the sort of public benefit/politically-correct "green" agriculture that State agencies and environmental groups envision in the "evolving" Delta ignores the truly innovative nature of Delta agriculture from its earliest days and implies that Delta farmers are out-of-step and need reformation.

37) Pg. 83: Chapter 6 - Agriculture: On pg. 11, it is stated that your report would focus on the PZ but include the SZ with regard to resource-based industries, including agriculture. This chapter nowhere specifies that all of its discussion treats of lands within both zones, that is, the whole Legal Delta; for clarity, please make that plain, if true, at the beginning of the chapter. It is assumed, then, because not explicit in their titles, that tables 7 - 23 furnish data on Legal Delta agriculture. In addition, please comment on the future of agriculture in the SZ, since these lands are presumably not as protected from urbanization by the Delta Protection Act as are the PZ lands.

38) Pg. 85 County Crop Reports: Which "outside sources" did you consult and where "below", other than the UC Cost and Return studies, are they described? Crop Categories are in which appendix?

39) Pg.86-87: Table 6 shows 2008 total available farmland (presumably Legal Delta) at 500,383 acres. Table 7 shows 2010 actual acreage planted at 457,544 acres. This is a not insignificant 8.7% difference of total available. Did you research at all the reasons for this discrepancy to determine if economic or other factors were at play?

40) Pg. 98: 4.2: Mention here that for eight of nine current BDCP conveyance alternatives (excluding the No Project Alternative), up to 113,000 total acres of restored and protected habitat is planned.

41) Pg. 98 middle Re: 8,000 acres required for tunnel conveyance: Did you research loss of productivity due to other possible impacts of these facilities, such as disruption of small existing North Delta diversions, impacts due to tunnel ancillary facilities such as power lines, set-back levees across from intakes, effects of maintenance easements, impacts on the rest of Pearson District of proposed 750 acre forebay at 32' above sea level, etc.?

42) Pg. 95 - 104: Could you attempt to research and discuss the economic implications to total Delta agricultural output of the passage of a substantial amount of agricultural land (A) from the private sector to public and/or non-profit ownership, and (B) to

agricultural easements dedicated to "wildlife-friendly" farming? Examples could be agricultural lands in Stone Lakes NWR, those owned by The Nature Conservancy on Staten Island, and public lands in the Yolo Bypass. Are such lands farmed profitably in the traditional economic sense, or are these farming activities subsidized by public funding in favor of "public benefits"?

43) Pg. 110: Chapter 7: Recreation and Tourism: Overview and Key Findings: Eight of these bullets are repeated verbatim on P. 140. Maybe this practice is normal for reports like this but the redundancy is jarring and confusing.

44) Pg. 112 bottom: "Nearby residents visit virtually every day" seems to leave a false impression that all residents do this. Maybe better? "Visits by residents of nearby areas occur..."

45) Pg. 113: Last sentence: "...and sometimes, perhaps, a Legacy Community..." Suggest removing one of the underlined words.

46) Pg. 114: 3.2.1.1 Add the Yolo Basin Foundation as a private non-profit providing recreation opportunities?

47) Pg. 114: 3.2.1.2 Can you tell us more in Section 3.2.1.3 about the three public marinas mentioned here?

48) Pg. 119: 3.2.1: (A) What percentage of the publicly owned land is open to public recreation access and how often? (B) Please provide more information on the public access trails, including proposed routes and status. Consider including here the Clarksburg Trail proposed by West Sacramento to run from South River Road near Jefferson Boulevard to Pumphouse Road just north of Clarksburg. The first 3.2 miles within the West Sacramento city limits has already been partially developed. (C) Figure 27 does not show public parks but rather several types of private tourist attractions. (Or maybe they are there - most of the maps in this whole report are largely unreadable in either my black and white hard copy or the color copy I have seen online.)

49) Pg. 120: Campsites: There is some confusion here. Table 25 shows under Accommodation 22 PZ establishments though Table 26 lists only 1. If the other 21 are campgrounds, Table 26 should show an additional pair of columns "Campgrounds" showing number of establishments and number of campsites to account for the approximately 2,100 (p.119) or 2,182 (Table 24) campsites in the Delta.

50) Pg. 120: 3.2.1.5: Please don't list "private lands with restricted public access" as a "constraint". This language leaves the impression that the mere existence of private lands is detrimental to the public good, a concept that Americans should find odd if not ominous. This bullet is also not "described in more detail below" on p. 121 - 122, where, I agree, more does need to be said about "agriculture/recreation conflicts".

51) Pg. 120: Table 25: Delta Scenic and Sightseeing: Doesn't Delta Ecotours operate from within the PZ as well as from Rio Vista?

52) Pg. 123 top: "lack of an overall responsible agency throughout the Delta..." Is anyone interested in advocating for creation of a single "Delta County"?

53) Pg. 123 middle: Re: "...lack of information sources about the Delta..." Actually there are several good waterway maps for boaters and anglers, and marina operators supply much help. However, there are few good maps to aid automobile visitors. Even the AAA has no Delta map; their "Central California" map covers the whole Delta, but better detail is provided only by combined use of their "San Francisco Bay" and "Gold Country" maps, giving a concrete example of the Delta's present lack of identity as a "place" in California.

54) Pg. 130: The top sentence lists "hiking" in resources-related recreation; in the bottom paragraph and elsewhere "hiking" is listed in the right-of-way recreation category.

55) Pg. 130 toward bottom: Are there any urban parks in the Primary (please capitalize) Zone? A small one in Hood comes to mind.

56) Pg. 131: "Competing destinations" While I have always enjoyed traveling by car and train through the Central Valley, I'm skeptical that Central Valley farmlands would be a tourist destination for many; in fact it is not mentioned at the bottom of pg. 124 with the others listed here.

57) Pg. 133 2nd paragraph: the first sentence should begin "The economic impact of recreation in (or within) the Delta..."

58) Pg. 134 Table 33 "Other Resource-Related...": the left column bottom should read "Total" not "Other".

59) Pg. 138: Discussion of falling trends in fishing and hunting: these numbers may reflect the rising costs of boat fuel, fishing licenses, ammunition, and increasing regulation of hunting and firearms ownership.

60) Pg. 141: 4.1.1.1 The second and third sentences seem grammatically incorrect.

61) Pg. 141: 4.1.1.1.: The description here of the "landside" once again leaves the impression that private land dedicated to the production of farm products somehow ought to be open to the public. Farming is not a recreation or a hobby for most farmers; it is a business and one of the more hazardous of occupations.

62) Pg. 141: 4.1.1.2: The Delta is not only unknown to many in the Bay Area; many residents of metropolitan Sacramento have little if any notion of its location or even existence.

63) Pg. 142: First paragraph, last sentence: "...land for parking is limited on or beside (or landside of) levees".

64) Pg. 142: 4.1.1.6: the bottom sentence is ungrammatical. Try prefacing it with "Because it is.... also, "lack" should probably be "lacks". "The unfamiliar boater" should become " a boater unfamiliar with it...".

65) Pg. 143: Third paragraph: Eliminate "further".

66) Pg. 143 -144: There is quite a bit of "fluff" - redundancy, hazy logic, and wishful thinking here. Shorten and sharpen this section. If the Delta is to provide more recreational opportunities for the demand that is foreseen, some extremely careful and thoughtful planning and investment will be needed to prevent a number of thorny conflicts among agriculture, recreation, (including especially increased automobile traffic), and habitat areas and activities from arising to hinder the realization of the glowing ideas contained in these paragraphs.

I have comments on the remainder of the Report, but I have run out of time. I hope some of my comments may make an already very good report better. Thank you to everyone who has worked so hard and well.